REMARKS

Reconsideration of this application is respectfully requested.

In the Office Action dated November 11, 2007, claims 1-36 were pending. Claims 1-34 were rejected. Claims 35-36 were allowed. In this response, no claims have been amended. No claims are canceled. No new matter has been added. Thus, claims 1-36 remain pending.

Rejections under 35 U.S.C. § 103(a)
Claims 1-9, 11-15, 22-26, 31 and 33-34

Claims 1-9, 11-15, 22-26, 31 and 33-34 stand rejected under 35 U.S.C. §103(a) as being unpatentable over "The Spider's Apprentice" by Linda Barlow (hereinafter "Linda") in view of Li, US Patent Application Publication No. 2002/0059161 (hereinafter "Li"). However, Applicant respectfully submits that Applicant's claims 1-9, 11-15, 22-26, 31 and 33-34 are patentable over the cited references.

In regards to claim 1, Applicant respectfully submits that claim 1 is separately patentable over Linda in view of Li for at least the reason that neither Linda nor Li, individually or in combination, teach or suggest the limitation of matching data terms corresponding to a search term and a related term, the search term and the related term appearing together in one sentence in a web page which includes at least one of predetermined relevant terms of a subject matter domain and the data terms being generated based on occurrence frequencies within a document.

Rather, Linda discloses a concept-based search determining what you mean, not just what you say (Linda, page 2). Linda also describes software determining meaning by calculating the frequency with which certain words appear (Linda, page 2). According to Linda, the concept-based indexing is a good idea but far from perfect (Linda, page 2). Clearly, Linda's concept based search is based on concept-based indexing. According to Linda, (concept based) search result is best when entering a lot of words, all of which roughly refer to the concept to search about (Linda, pages 2-3). Thus, Linda's concept based search determines meaning (concepts) from a query and generates hits from documents indexed with concepts. However, Linda does not teach or suggest matching data terms corresponding to a search term

and a related term, the search term and the related term appearing together in one sentence in a web page which includes at least one of predetermined relevant terms of a subject matter domain and the data terms being generated based on occurrence frequencies within a document.

Li, on the other hand, provides a technique for efficient indexing and processing support for query expansion (Li, [0034], Fig. 12). In Li, query expansion is based on expanding query words on semantic similarity and syntactic relationships (Li, [0038]). Li also discloses syntactic relationships are determined from the document collection using word co-occurrence information to relate two words syntactically (Li, [0038]).

The Office Action states that "i.e., syntactic relationships in IR are determined from the document collection itself, in particular, word co-occurrence information can be used to relate two words syntactically" is taught by Li (Office Action, page 3). It appears that the Office Action alleges that Li's techniques of "syntactic relationships" and "word co-occurrence information" include the limitation of a search term and a related term appearing together in one sentence in a web page. Applicant respectfully disagrees.

In particular, Li specifically points out that <u>syntactically co-occurring words</u> are <u>words co-occurring in the same document above a certain frequency</u> (Li, [0006]). Clearly, two words in a document can be co-occurring in Li even though they do not belong to the same sentence. Thus, Li does not teach or suggest matching data terms corresponding to a search term and a related term, the search term and the related term appearing together in one sentence in a web page which includes at least one of predetermined relevant terms of a subject matter domain and the data terms being generated based on occurrence frequencies within a document.

As noted above, Linda does not teach or suggest the noted limitation. Thus, even if Linda and Li were combined, such a combination still lacks the limitation of matching data terms corresponding to a search term and a related term, the search term and the related term appearing together in one sentence in a web page which includes at least one of predetermined relevant terms of a subject matter domain and the data terms being generated based on occurrence frequencies within a document.

Therefore, it is respectfully submitted that independent claim 1 is patentable over Linda in view of Li.

Independent claim 22 includes similar limitations as noted above. Accordingly, for at least the similar reasons as discussed above, it is respectfully submitted that claim 22 is patentable over the cited references.

Given that claims 3, 4, 8, 24, 33 and 34 depend from and include all limitations of one of independent claims 1 and 22, Applicant respectfully submits that claims 3, 4, 8, 24, 33 and 34 are patentable over the cited references.

Claims **10, 12, 15-21, 27-30 and 32**

Claims 10, 12, 15-21, 27-30 and 32 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Linda in view of Li and further in view of Liddy et al., US Patent No. 6,026,388 (hereinafter "Liddy"). However, Applicant respectfully submits that Applicant's claims 10. 12, 15-21, 27-30 and 32 are patentable over the cited references.

Independent claims 10, 15, 19 and 27 include limitations similar to those recited in claim 1. The rest of the claims depend from one of the above independent claims. It is respectfully submitted that Liddy also fails to disclose or suggest the limitations set forth above.

Rather, Liddy teaches a technique for generating sophisticated representations of the contents of both queries and documents in a retrieval system by using natural language processing techniques to represent, index, and retrieve texts at the multiple levels at which humans construe meanings in writing (Liddy, Abstract). However, nowhere does Liddy disclose or suggest matching data terms corresponding to a search term and a related term, the search term and the related term appearing together in one sentence in a web page which includes at least one of predetermined relevant terms of a subject matter domain and the data terms being generated based on occurrence frequencies within a document.

Further, Linda teaches how to get the most from search engines like AltaVista, Infoseek, Excite, Webcrawler, Lycos, HotBot, and the Yahoo Directory (Linda, page 1).

Liddy, on the other hand, is related to the application of natural language processing techniques to the interpretation and representation of computer text files and to the matching of natural language queries to documents with the aid of user interactions (Liddy, col. 1, lines 60-65). Li, however, relates to reducing the size of indices used to perform query expansion (Li, [0002]). Clearly, Lidan, Liddy and Li address quite different issues requiring considerably different approaches. There is neither suggestion nor motivation to combine the teachings of Linda, Liddy and Li.

As such, not only do Linda, Liddy and Li not disclose, individually or in combination, all limitations of claims 10, 12, 15-21, 27-30 and 32 but the references, considered as a whole, do not suggest the desirability and thus the obviousness of making the combination. It would be impermissible hindsight to combine Linda, Liddy and Li based on Applicant's own disclosure. Even if they were combined, such a combination still lacks the limitations set forth above.

Therefore, for at least the above stated reasons, it is respectfully submitted that independent claims 10, 15, 27 and dependent claims 12, 16-18. 20-21, 28-30 and 32 are patentable over the cited references. Withdrawal of the rejections is respectfully requested.

Allowed Subject Matter

Applicant notes with appreciation the Examiner's indication that claims 35-36 are allowed.
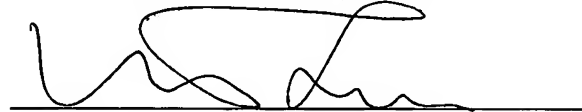
CONCLUSION

In view of the foregoing, applicant respectfully submits that the applicable objections and rejections have been overcome. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned attorney at (408) 720-8300.

Please charge Deposit Account No. 02-2666 for any shortage of fees in connection with this response.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

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